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ATTORNEY FOR DEFENDANT Healthcare Revenue Recovery Group, LLC

447-102973(CMS/JRS)

Elaine Levins and William Levins, on behalf of themselves and others similarly situated

VS.

Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services UNITED STATES DISTRICT COURT

DOCKET NO. 1:17-cv-928-RBK-KMW

CIVIL ACTION

DECLARATION OF DAVID FRIEDLANDER

- I, David Friedlander, do hereby declare and certify under penalty of perjury as following:
- I am the President of Healthcare Revenue Recovery Group, LLC
 ("HRRG"), and have personal knowledge about this case.
- 2. I submit this declaration in support of HRRG's motion for summary judgment.

- 3. Exhibit K, submitted in support of HRRG's Statement of Facts, is a "Final Notice" sample letter that Plaintiffs received before receiving any contact from ARS Account Resolution Services ("ARS").
- 4. The "Final Notice" sample letter is a form letter sent to consumers by HRRG's letter vendor.
- 5. HRRG does not retain the sent copies of the "Final Notice" sample letter sent to consumers.
- 6. However, Plaintiffs' Final Notice letter would have contained the same substantive information with the addition of their address in the "SAMPLE PATIENT" field, account number, and creditor information.
- 7. The Final Notice letter is sent to consumers with severely delinquent accounts and advises them that they may receive contact from ARS, a division of HRRG.
- 8. This Final Notice would have preceded any collection efforts by the ARS division.
- 9. This affidavit is made on personal knowledge and I am competent to testify on the matters stated herein.

Per 28 U.S.C. 1746, I hereby declare and certify under penalty of perjury that the above is true and correct.

/s/ David M. Friedlander
David M. Friedlander
President
Healthcare Revenue Recovery Group, LLC

Dated: July 5, 2022